

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 THROUGH
5, and JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON CORPORATION'S
MOTION TO IMPOUND THEIR REPLY MEMORANDUM OF LAW
IN SUPPORT OF THEIR EMERGENCY MOTION FOR A PROTECTIVE ORDER**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson")
submit this Motion to Impound Their Reply Memorandum of Law in Support of Their
Emergency Motion for a Protective Order.

Impoundment is necessary because defendants' Reply Memorandum of Law contains
excerpts from responses to plaintiff's Second Set of Interrogatories Propounded to Defendants
that have been designated as "Confidential," which requires a motion for impoundment under the
terms of the Stipulated Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By its attorneys,

/s/ David M. Moss

Anthony S. Fiotto (BBO #558089)

David M. Moss (BBO #649707)

GOODWIN PROCTER LLP

Exchange Place

Boston, Massachusetts 02109-2881

Telephone: (617) 570-1000

Facsimile: (617) 523-1231

DATED: April 25, 2005

LIBA/1533498.1